

To: Daly, Carl[Daly.Carl@epa.gov]
Cc: Morales, Monica[Morales.Monica@epa.gov]; Rothery, Deirdre[Rothery.Deirdre@epa.gov]; Ostendorf, Jody[ostendorf.jody@epa.gov]
From: Sutin, Elyana
Sent: Thur 8/27/2015 8:08:58 PM
Subject: RE: Emission Inventory Request letter + authority language

Thanks Carl. This is helpful. I am looking into this and will get back to you as soon as I can.

Elyana

Elyana Sutin

U.S. EPA, Region 8

Regional Judicial Officer

Associate Regional Counsel

sutin.elyana@epa.gov

303.312.6899

From: Daly, Carl
Sent: Thursday, August 27, 2015 1:36 PM
To: Sutin, Elyana
Cc: Morales, Monica; Rothery, Deirdre; Ostendorf, Jody
Subject: Emission Inventory Request letter + authority language

Elyana

Ex. 5 - Attorney Client

This section is from the final Tribal NSR rule 7/1/11:

B. Paperwork Reduction Act

The information collection requirements in this rule have been submitted for approval to the Office of

Management and Budget (OMB) under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. The information collection

requirements are not enforceable until OMB approves them.

The information collection requirements resulting from this final rule are associated with certain records

and reports that are necessary for the Tribal agency (or the EPA Administrator in non-delegated areas), for example, to:

(1) Confirm the compliance status of stationary sources, (2) identify any stationary sources not subject to the

standards and identify stationary sources subject to the rules, and (3) ensure that the stationary source control requirements are being achieved. The information would be used by the EPA or Tribal enforcement personnel to (1) identify stationary sources subject to the

rules, (2) ensure that appropriate control technology is being properly applied, and (3) ensure that the emission control

devices are being properly operated and maintained on a continuous basis.

Based on the reported information, the delegate Tribes (or the EPA Administrator in non-delegated areas)

can decide which plants, records or processes should be inspected.

Below is what OAR had in the preamble for the latest 8/18/15 Tribal NSR proposed action for oil and gas sources:

B. Paperwork Reduction Act (PRA)

This action does not impose any new information collection burden under the PRA. OMB has previously approved the information collection activities contained in the existing regulations and has assigned OMB control number 2060-0003. This action merely proposes to establish a FIP which serves as a mechanism for true minor sources in the production segment of the oil and natural gas sector locating or located in areas covered by the Federal Indian Country Minor NSR rule to satisfy the requirements of the Federal Indian Country Minor NSR rule in lieu of obtaining a site-specific minor source permit.

Ex. 5 - Attorney Client

Thanks for taking a look at this.

Carl Daly, Director

Air Program

303-312-6416

From: Ostendorf, Jody

Sent: Thursday, August 27, 2015 11:59 AM

To: Daly, Carl

Subject: FW: Emission Inventory Request letter + authority language

fyi

Jody Ostendorf

State Implementation Plan Program Manager

Uinta Basin Project Coordinator

Air Quality Planning Unit (8P-AR)

1595 Wynkoop Street

Denver, CO 80202-1129

303.312.7814

From: Ostendorf, Jody

Sent: Thursday, August 27, 2015 11:58 AM

To: Sutin, Elyana

Cc: Morales, Monica

Subject: Emission Inventory Request letter + authority language

Hi Elyana,

Ex. 5 - Attorney Client

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Thanks,

Jody

Jody Ostendorf

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